



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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September 30, 2009

Via U.S. Mail and Electronic Mail

Ronald S. Dykstra
Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
rdykstra@waterboards.ca.gov

RE: **Comments on the Tentative Order for the City of Portola, Portola Wastewater Treatment Plant**

Dear Mr. Dykstra:

The Central Valley Clean Water Association (CVCWA) submitted comments on the Tentative Order for the City of Portola's Wastewater Treatment Plant on May 12, 2009 (Tentative Order). In our comments, we indicated that it was inappropriate for the effluent limitation for electrical conductivity (EC) to be set as a monthly average limit versus an annual average limit. Upon review of the revised Tentative Order, it appears that the Central Valley Regional Water Quality Control Board (Central Valley Water Board) disagreed with CVCWA's comments and revised the Tentative Order to include a monthly limitation for EC. In light of this modification, CVCWA finds it necessary to submit additional comments in opposition to the proposed modification. Our comments are as follows.

CVCWA believes it appropriate for the final EC limit in the Tentative Order to be set as an annual average limit because salinity does not cause short-term toxic effects. Further, the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) does not require short-term averages for EC. (See Basin Plan at p. III-3.00; Tentative Order at p. F-28.) The Basin Plan incorporates the drinking water maximum contaminant level for EC from Title 22 of the California Code Regulations (Title 22). (Basin Plan at p. III-3.00.) The secondary MCLs for EC are consumer-acceptance based, allow for higher short-term levels and are generally expressed as annual averages for drinking water providers. The Basin Plan also includes a salinity objective of 150 umhos/cm at a 90th percentile for well-mixed waters of the Middle Fork of the Feather River at 25 degrees Celsius as a 10-year rolling average. (Basin Plan at Table III-3, p. III-7.00; Tentative Order at p. F-28.)

Setting the final effluent limit for EC as an annual average would be consistent with the Regional Water Board's current permitting practice. (See, e.g., Order Nos. R5-2009-0010, R5-2009-0007, R5-2008-0177.) The Regional Water Board's salinity guidance provides that discharge permits should treat salinity consistently. (*Management Guidance for Salinity in Waste Discharge Requirements*, from P. Creedon, et. al to Program Managers (April 26, 2007) at p. 1.) Moreover, the salinity guidance encourages the use of "a long-term average, such as an annual average" for numeric EC limits based on performance. (*Id.* at p. 5.) The EC limit in the Tentative Order is performance-based. (Tentative Order at p. F-29.) Therefore, the Tentative Order should express the EC limit as an annual average instead of a monthly average.

Thank you for considering CVCWA's comments. Please contact me at (530) 268-1338 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Webster".

Debbie Webster
Executive Officer